

### REMARKS

In the aforementioned Office Action, claims 34-53 were rejected under 35 U.S.C. §102(b). In response, Applicant is amending claims 34, 39, 40, 42-45, 47, and 49-53. Applicant is also canceling claims 41 and 48, and adding claims 54 and 55 to cover further aspects of the invention. In view of the foregoing amendments and the following remarks, Applicant respectfully requests that the Examiner reconsider the Application.

#### Rejection under 35 U.S.C. § 102(b)

In paragraph 2 of the Office Action, the Examiner rejected claims 34-53 under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,333,313 to *Heising*. In response, Applicant is amending claim 34, and as the rejection might be applied to the amended claim, respectfully traverses.

Amended claim 34 recites in relevant part:

a correspondence text entry that is part of a dictionary word;  
a correspondence phoneme entry representing the pronunciation of the  
correspondence text entry; and  
a correspondence symbol for identifying the correspondence set and for use as a  
compressed data entry in generating said compressed pronunciation  
dictionary.

The "text entry" in the claimed invention is "part of a dictionary word," which is patentably distinguishable from each of "entry," "inflection," "definition," "pronunciation," "part of speech," or "usage note" in *Heising's* cited passage. Using

*Heising's* example of the word *factitious*, a "text entry" of the present invention can be "f," "a," "ac," "t," "i," "ous," etc. In contrast, in *Heising*, using the same exemplary word *factitious*, "entry" is "factitious"; "definition" is "something that has an effect," "gene," etc.; "part of speech" is "factitious," "factitiously," or "factitiousness;" and "usage note" is "used with 'into'" (column 6, line 32 to column 7 line 10). None of the possibilities for Applicant's claimed "text entry" is even close to the cited items. Therefore, the claimed "text entry that is part of a dictionary word" is patentably distinguished from *Heising*.

Claim 34 also recites "a correspondence phoneme entry representing the pronunciation of the correspondence text entry." *Heising's* cited passage discloses using "placeholders" for "each entry, inflection, definition. . ." wherein a placeholder is "an identifier which corresponds uniquely to each of the items above" (col. 3, lines 37-40). Thus, *Heising's* cited passage teaches the correspondence relationship between a "placeholder" and any one of the items "entry," "inflection," "definition," etc., but *Heising* does not teach or make obvious using a "phoneme," which represents the pronunciation of a word. Because *Heising* does not teach or make obvious using a "phoneme" or using a "text entry," *Heising* cannot teach or make obvious the claimed "phoneme entry representing the pronunciation of the correspondence text entry."

Further, claim 1 recites the limitation that the correspondence symbol is "for use as a compressed data entry in generating said compressed pronunciation dictionary," which is not taught or made obvious by the cited passage of *Heising*.

Based on the above-discussed differences from *Heising*, claim 34 is patentable.

Claims 35-39 depend from claim 34, and are therefore patentable for at least the same reasons as claim 34.

Claim 36 adds the limitation "wherein said tuning function eliminates redundant correspondence sets and low usage correspondence sets from said correspondence table." Even though *Heising's* cited passage discloses using an escape code followed by a literal word number to eliminate *an entry* from his translation table (col. 4, lines 52-55), *Heising* does not disclose or make obvious that "an entry in the translation table" includes "a correspondence text entry," a "correspondence phoneme entry" and "a correspondence symbol" as does a "correspondence set" of the claimed invention. Because *Heising's* "entry" and the claimed invention's "set" are patentably distinguishable, claim 36 is patentable for this additional limitation.

Claim 37 adds the limitation "wherein said correspondence table includes said correspondence sets for all practical combinations of said correspondence text entries and said correspondence phoneme entries for a given language." Because *Heising* does not disclose or make obvious using a correspondence phoneme entry or a correspondence text entry, *Heising* cannot disclose or make obvious the claimed "practical combinations of said correspondence text entries and said correspondence phoneme entries." Therefore, claim 37 is patentable for this additional limitation.

Claim 39 adds the limitation "wherein correspondence phoneme entries of said grouping are similar to one another in pronunciation." *Heising's* cited passage discloses the concepts of "recurring pattern," verbs having "four inflected forms," and "some of the constituent parts occur much more frequently than the others," but does not teach

or make obvious grouping *phonemes* that are *similar* to one another in *pronunciation*.

Therefore, claim 39 is patentable for this additional limitation.

Claim 40 recites the limitations "text entry that is part of a dictionary word," and "phonetic entry representing the pronunciation of said correspondence text entry," which are not taught or made obvious by *Heising* (discussed above). Claim 40 also adds the limitation "wherein a matching system uses said correspondence phonetic entry to match said at least one correspondence set in generating a compressed pronunciation dictionary," which is not taught or made obvious by *Heising*. Therefore, claim 40 is patentable.

Claims 41 and 48 are being canceled.

Claims 42-47 and 49 depend from claim 40, and are therefore patentable for at least the same reasons as claim 40.

Claim 43 adds the limitation "said correspondence symbol is used as a compressed entry in generating said compressed pronunciation dictionary," which is not taught or made obvious by *Heising* (discussed above). Therefore claim 43 is patentable for this additional limitation.

Claim 50 recites the limitation "wherein said correspondence symbol is for use as a compressed entry in generating a compressed pronunciation dictionary," which is not taught or made obvious in *Heising*. Therefore claim 50 is patentable.

Claims 51-53 depend from claim 50, and are therefore patentable for at least the same reasons as claim 50.

Claim 53 adds the limitation "inputting a correspondence text entry that is part of a dictionary word," which is not taught or made obvious by *Hesing* (discussed above). Therefore, claim 53 is patentable for this additional limitation.

Claim 54 depends from claim 53, and is therefore patentable for at least the same reasons.

Claim 55 depends from claim 34, and is therefore patentable for at least the same reasons.


#### CONCLUSION

Applicant contends that the rejection of claims 34-53 is fully traversed and overcome and that added claims 54 and 55 present subject matter that is patentable over the prior art of record. Therefore, Applicant respectfully requests that the Examiner pass the application to issuance.

Respectfully submitted,  
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